

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

LATISHA A. REED : No. 19-17972-ELF

ANSWER TO MOTION OF PHFA AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. PHFA has refused to accept debtor's mortgage payments.
7. Denied. PHFA has refused to accept debtor's mortgage payments.
8. Denied. PHFA has refused to accept debtor's mortgage payments.
9. Denied. PHFA has refused to accept debtor's mortgage payments.

WHEREFORE Debtor respectfully requests this Honorable Court
deny Movant's Motion for Relief

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 01/22/2021

A copy of this Answer is being served on Rebecca A. Solarz,
Esquire, and the Chapter 13 Trustee.

/s/ David M. Offen
David M. Offen
Attorney for Debtor